

**THE UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

CORY HAZDOVAC, individually and  
on behalf of all others similarly  
situated,

Plaintiff,

vs.

MERCEDES BENZ USA, LLC, and  
DOES MBUSA 1 through 10,  
inclusive,

Defendants.

Case No. 20-cv-00377-RS

**DECLARATION OF JORDAN  
BAKONDY REGARDING  
IMPLEMENTATION OF CAFA  
NOTICE**

1 I, Jordan Bakondy, declare as follows:

2 1. I serve as a Project Manager at Eisner Advisory Group, LLC (“EAG”  
3 or “EisnerAmper”), a comprehensive legal administration firm specializing in the  
4 development, implementation, and impartial management of intricate legal  
5 notification programs. EAG was asked by Defense Counsel to coordinate and  
6 administer the distribution and mailing of CAFA Notice in the above-referenced  
7 matter (the “Action”). The statements presented herein are based on my personal  
8 knowledge, as well as information provided by other skilled EAG professionals  
9 operating under my supervision, along with my examination of information and  
10 documents furnished by Defense Counsel.

11 **CAFA NOTICE IMPLEMENTATION**

12 2. On November 24, 2025, pursuant to 28 U.S.C. §1715, EAG, on behalf  
13 of the Defendant, commenced mailing notice of this settlement and related  
14 materials to the Attorneys General of all U.S. states, U.S. Territories and Puerto  
15 Rico as well as the Attorney General of the United States. Notices were mailed via  
16 USPS Certified Mail. The CAFA Notice Service List is attached hereto as Exhibit  
17 A.

18 3. The materials sent to the federal and state officials included a cover  
19 letter, which provided notice of the proposed settlement of the above-captioned  
20 case. The cover letter is included as Exhibit B.

21 4. The cover letter was accompanied by a CD, which included the  
22 following documents:

23 a. Per 28 U.S.C. § 1715(b)(1) – Complaint and Any  
24 Amended Complaints:

25 (1) Class Action Complaint dated December 4,  
26 2019.

1 (2) First Amended Class Action Complaint dated  
2 June 15, 2020.

3 (3) Second Amended Class Action Complaint dated  
4 February 16, 2022.

5 (4) Third Amended Class Action Complaint dated  
6 November 13, 2025.

7 b. Per 28 U.S.C. § 1715(b)(3) – Notification to Settlement  
8 Class Members:

9 (1) Short-Form Notice (Exhibit C to the Declaration  
10 of Brandon Schwartz Regarding Settlement  
11 Administration and Notice Plan);

12 (2) Digital Banner Notice (Exhibit D to the  
13 Declaration of Brandon Schwartz Regarding  
14 Settlement Administration and Notice Plan);  
15 and

16 (3) Long-Form Notice (Exhibit E to the Declaration  
17 of Brandon Schwartz Regarding Settlement  
18 Administration and Notice Plan).

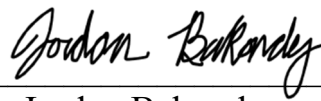
19 c. Per 28 U.S.C. § 1715(b)(4) – Class Action Settlement  
20 Agreement:

21 (1) Notice of Motion for Preliminary Approval of  
22 Class Action Settlement and Memorandum of  
23 Points and Authorities; Declaration of Jordan L.  
24 Lurie; and Proposed Preliminary Approval  
25 Order Filed Concurrently dated November 13,  
26 2025, with Exhibits.

1 (2) Class Action Settlement Agreement and Release  
2 filed November 13, 2025, concurrently with the  
3 Motion for Preliminary Approval and attached  
4 as Exhibit 1 to the Declaration of Jordan L.  
5 Lurie.

6 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the  
7 foregoing is true and correct to the best of my knowledge and belief.  
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9 Executed this 1<sup>st</sup> day of December 2025 in Houston, Texas.  
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13 Jordan Bakondy  
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# Exhibit A

CAFA Notice Service List							
Havdovac v. Mercedes-Benz USA, LLC et al., Case No. 3:20-CV-00377 (United States District Court, Northern District of California)							
Name1	Name2	Address1	Address2	Address3	City	State	Zip
Office of the Attorney General		1031 W. 4th Avenue, Suite 200			Anchorage	AK	99501-1994
Office of the Attorney General		501 Washington Avenue	PO Box 300152		Montgomery	AL	36104
Office of the Attorney General		323 Center Street, Suite 200			Little Rock	AR	72201-2610
Office of the Attorney General		PO Box 7			Pago Pago	AS	96799
Office of the Attorney General		2005 N Central Ave			Phoenix	AZ	85004-2926
Office of the Attorney General	CAFA Coordinator, Consumer Law Section	455 Golden Gate Avenue, Suite 11000			San Francisco	CA	94102
Office of the Attorney General		Ralph L. Carr Colorado Judicial Center	1300 Broadway, 10th Floor		Denver	CO	80203
Office of the Attorney General		165 Capitol Avenue			Hartford	CT	06106
Office of the Attorney General		441 4th Street NW, Suite 1100S			Washington	DC	20001
United States Office of the Attorney General	US Department of Justice	950 Pennsylvania Ave, NW			Washington	DC	20530-0001
Office of the Attorney General		820 North French Street	6th Floor		Wilmington	DE	19801
Office of the Attorney General		The Capitol	PL-01		Tallahassee	FL	32399-1050
Office of the Attorney General		40 Capitol Square SW			Atlanta	GA	30334
Office of the Attorney General	Administrative Division	590 S. Marine Corps Dr., Suite 901			Tamuning	GU	96913
Department of the Attorney General		425 Queen Street			Honolulu	HI	96813
Office of the Attorney General		Hoover State Office Building	1305 East Walnut Street		Des Moines	IA	50319
Office of the Attorney General		954 West Jefferson Street, 2nd floor	PO Box 83720		Boise	ID	83720-0010
Office of the Attorney General		100 West Randolph Street			Chicago	IL	60601
Office of the Attorney General		Indiana Government Center South	302 West Washington Street, 5th Floor		Indianapolis	IN	46204
Office of the Attorney General		120 SW 10th Ave, 2nd Floor			Topeka	KS	66612-1597
Office of the Attorney General		700 Capitol Avenue, Suite 118			Frankfort	KY	40601-3449
Office of the Attorney General		PO Box 94005			Baton Rouge	LA	70804
Office of the Attorney General	ATTN: CAFA Coordinator/General Counsel's Office	One Ashburton Place			Boston	MA	02108
Office of the Attorney General		200 St. Paul Place			Baltimore	MD	21202
Office of the Attorney General		6 State House Station			Augusta	ME	04333
Office of the Attorney General		G. Mennen Williams Building	525 West Ottawa Street	PO Box 30212	Lansing	MI	48909
Office of the Attorney General		445 Minnesota Street, Suite 1400			St Paul	MN	55101-2131
Office of the Attorney General		Supreme Court Building	207 West High Street		Jefferson City	MO	65102
Office of the Attorney General		Administrative Building	PO Box 10007		Saipan	MP	96950
Office of the Attorney General		Walter Sillers Building	550 High Street, Suite 11		Jackson	MS	39201
Office of the Attorney General		Justice Building Third Floor	215 North Sanders		Helena	MT	59601
Office of the Attorney General	ATTN: Consumer Protection	114 West Edenton Street			Raleigh	NC	27603
Office of the Attorney General		State Capitol	600 East Boulevard Avenue, Dept. 125		Bismarck	ND	58505
Office of the Attorney General		2115 State Capitol	PO Box 98920		Lincoln	NE	68509
Office of the Attorney General		33 Capitol Street			Concord	NH	03301
Office of the Attorney General		RJ Hughes Justice Complex	25 Market Street	PO BOX 080	Trenton	NJ	08625-0080
Office of the Attorney General	ATTN: Farrah Diaz, Paralegal	201 3rd St NW, Suite 300			Albuquerque	NM	87102
Office of the Attorney General		Old Supreme Court Building	100 North Carson Street		Carson City	NV	89701
Office of the Attorney General		The Capitol			Albany	NY	12224-0341
Office of the Attorney General		State Office Tower	30 East Broad Street, 14th Floor		Columbus	OH	43215
Office of the Attorney General		313 NE 21st Street			Oklahoma City	OK	73105
Office of the Attorney General	Oregon Department of Justice	1162 Court Street NE			Salem	OR	97301-4096
Office of the Attorney General		16th Floor, Strawberry Square			Harrisburg	PA	17120
Office of the Attorney General		PO Box 9020192			San Juan	PR	00902-0192
Office of the Attorney General	ATTN: Lisa Pinsonneault/CAFA Notice	150 South Main Street			Providence	RI	02903
Office of the Attorney General		PO Box 11549			Columbia	SC	29211-1549
Office of the Attorney General		1302 E. Highway 14, Suite 1			Pierre	SD	57501-8501
Office of the Attorney General and Reporter		PO Box 20207			Nashville	TN	37202
Office of the Attorney General		Capitol Station	PO Box 12548		Austin	TX	78711-2548
Office of the Attorney General		Utah State Capitol Complex	350 North State Street, Suite 230		Salt Lake City	UT	84114-2320
Office of the Attorney General		202 North Ninth Street			Richmond	VA	23219
Office of the Attorney General		34-38 Kronprindsens Gade	Gers Building, 2nd Floor		St Thomas	VI	00802
Office of the Attorney General		109 State Street			Montpelier	VT	05609
Office of the Attorney General		1125 Washington Street SE	PO Box 40100		Olympia	WA	98504-0100
Office of the Attorney General	Wisconsin Department of Justice	PO Box 7857			Madison	WI	53707-7857
Office of the Attorney General		State Capitol	Building 1, Room E-26		Charleston	WV	25305
Office of the Attorney General		Kendrick Building	2320 Capital Avenue		Cheyenne	WY	82002

# Exhibit B



North America Europe Asia

**TROY M. YOSHINO**  
Partner  
415-591-1421  
tyoshino@winston.com

November 24, 2025

**VIA CERTIFIED MAIL**

To: State and Federal Officials pursuant to 28 U.S.C. § 1715 (see enclosed distribution list)

**Re: CAFA Notices for the Proposed Settlement in *Hazdovac v. Mercedes-Benz USA, LLC et al.*, Case No. 20-cv-00377-RS, U.S. District Court for the Northern District of California**

Dear Attorney General:

Pursuant to the federal Class Action Fairness Act (“CAFA”), 28 U.S.C. § 1715, Defendant Mercedes-Benz USA, LLC (“MBUSA”) hereby notifies you of the proposed settlement in the above-captioned action currently pending in the United States District Court for the Northern District of California, before the Honorable Richard Seeborg.

This action relates to allegations that MBUSA did not identify fourteen (14) vehicle parts (“the Subject Parts”) in Mercedes-Benz vehicles that should properly be classified as “high-cost” or “high-priced” emissions warranty parts or (“HPP”), under the requirements of the California Emissions Warranty (“HPP Warranty”) (California Code of Regulations (“CCR”) Title 13, § 2035 et seq.) and covered under the HPP Warranty for 7 years and/or 70,000 miles, whichever comes first. MBUSA denies the material factual allegations and legal claims asserted by the Plaintiff and Settlement Class Members in the Litigation, including, but not limited to, any and all charges of wrongdoing or liability, or allegations of defect, arising out of any of the conduct, statements, acts or omissions alleged, or that could have been alleged, in the Litigation.

For purposes of the proposed settlement, the Settlement Class is defined as:

All Persons, in Section 177 States, who purchased or leased Mercedes-Benz vehicles between model year 2015 and the present that are covered by an HPP Warranty.

As defined in section 1.28 of the Settlement Agreement, “Section 177 States” or “Reg. 177 States” means states that have implemented California’s Low-Emission Vehicle (LEV) criteria pollutant and greenhouse gas (GHG) emission regulations and Zero Emission Vehicle (ZEV) regulations under Section 177 of the Clean Air Act, 42 U.S.C. § 7507. At various times during the relevant period (and as set forth in Exhibit A to the Settlement Agreement), the Reg. 177 States included, in addition to California: Colorado, Connecticut, Delaware, Maine, Maryland, Massachusetts, Minnesota, Nevada, New Jersey, New York, Oregon, Pennsylvania, Rhode Island, Vermont, Virginia, and Washington. Certain of these states are Reg. 177 States only as to certain model year Subject Vehicles.



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Pursuant to 28 U.S.C. § 1715(b), please find enclosed a CD containing, and paper copies of, the following materials related to the proposed settlement:

1. **Copy of the complaint, any amended complaints, and any materials filed with the complaints. *See* 28 U.S.C. § 1715(b)(1).**

Enclosed is the Complaint, dated December 4, 2019; the First Amended Complaint, dated June 15, 2020; the Second Amended Complaint, dated February 16, 2022; and the operative Third Amended Complaint, dated November 13, 2025.

2. **Notice of any scheduled judicial hearing in the class action. *See* 28 U.S.C. § 1715(b)(2).**

A hearing on Plaintiffs' Motion for Preliminary Approval of the Class Action Settlement is scheduled for December 4, 2025, at 1:30 p.m. before the Honorable Richard Seeborg of the United States District Court for the Northern District of California, 450 Golden Gate Ave., Courtroom 3, 17th Floor, San Francisco, CA, 94102. No other hearings have yet been scheduled.

3. **Any proposed or final notification to class members of a proposed settlement and right to request exclusion from the class action. *See* 28 U.S.C. § 1715(b)(3).**

Enclosed is a copy of the Declaration of Brandon Schwartz Regarding Settlement Administration and Notice Plan (the "Schwartz Declaration"), which was filed concurrently with Plaintiffs' Motion for Preliminary Approval of Class Action Settlement ("Plaintiffs' Motion"). *See* Dkt. No. 121. The Schwartz Declaration describes the proposed notice plan. Exhibits C-E to the Schwartz Declaration are, respectively, the proposed Class Notice (a short-form notice), samples of social-media banner notices that will direct potential Settlement Class Members to the Settlement Website (which shall include copies of the proposed notices and other information on the settlement), and the proposed Class Notice (a long-form notice). The proposed notifications inform potential Settlement Class Members of the terms of the proposed settlement and of their rights and legal options.

4. **Any proposed or final class action settlement. *See* 28 U.S.C. § 1715(b)(4).**

Enclosed is a copy of the Class Action Settlement Agreement and Release, which was filed concurrently with Plaintiffs' Motion. Dkt. No. 121-4.

5. **Any settlement or other agreement contemporaneously made between Class Counsel and Counsel for the defendants. *See* 28 U.S.C. § 1715(b)(5).**

There are no additional settlement or other contemporaneous agreements made between Class Counsel and MBUSA's counsel in this matter.

6. **Any final judgment or notice of dismissal. *See* 28 U.S.C. § 1715(b)(6).**

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Page 3

To date, neither a final judgment nor a notice of dismissal has been entered in this matter.

**7. Names of class members who reside in each State and estimated proportionate share of the claims of such members to the entire settlement. *See* 28 U.S.C. § 1715(b)(7).**

At the time of this notice, it is not feasible to provide the information described in 28 U.S.C. §§ 1715(b)(7)(A)-(B). In accordance with the Settlement Agreement, within seven (7) days after entry of the Preliminary Approval Order, MBUSA will provide a database of Vehicle Identification Numbers (“VINs”) for all Subject Vehicles sold in the United States. To identify Settlement Class Members and their relevant mailing information, the Settlement Administrator will coordinate with S&P Global, which licenses state motor vehicle data through its R. L. Polk & Co. (“Polk”) entity, a leader in automotive data solutions to access state motor vehicle registration records. This coordination will allow the Settlement Administrator to obtain all registrations for the Subject Vehicles in Section 177 States, including the date of registration, and the names and addresses of individuals associated with each VIN. The list of class members by state may be provided upon request to the Settlement Administrator once the information is available. To request a copy of this list, please email [jordan.bakondy@eisneramper.com](mailto:jordan.bakondy@eisneramper.com).

**8. Any written judicial opinion relating to the materials described under subparagraphs (3) through (6). *See* 28 U.S.C. § 1715(b)(8).**

To date, there are no written judicial opinions relating to the settlement materials described above.

If you have any questions about this notice or the above-referenced litigation, please contact the undersigned counsel for MBUSA.

Sincerely,

/s/ Troy M. Yoshino

Troy M. Yoshino